United States District Court Southern District Of New York

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case	
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This Document Relates to: All Cases

RESPONSE OF DEFENDANTS KINGDOM OF SAUDI ARABIA, HRH PRINCE SULTAN BIN ABDULAZIZ AL-SAUD, HRH PRINCE TURKI AL-FAISAL AL-SAUD, AND HRH PRINCE MOHAMED AL FAISAL AL SAUD TO PLAINTIFFS' MOTION FOR ENTRY OF FINAL JUDGMENTS

The Plaintiffs, acting through the Plaintiffs' Executive Committee, have filed a motion, pursuant to Rule 54(b), for the entry of final judgments against them, and for certification of those judgments to the U.S. Court of Appeals for the Second Circuit (the "Rule 54(b) Motion"). The Rule 54(b) Motion follows this Court's decision, on January 18, 2005, to dismiss all claims against, *inter alia*, the Kingdom of Saudi Arabia, HRH Prince Sultan bin Abdulaziz Al-Saud, HRH Prince Turki Al-Faisal Al-Saud, and HRH Prince Mohamed Al Faisal Al Saud in certain cases consolidated in this proceeding, and the Court's order on May 6, 2005, dismissing all claims in all remaining consolidated cases against those defendants.

While we do not agree with all of the Plaintiffs' characterizations of the nature or novelty of the issues, the Kingdom, Prince Sultan, Prince Turki, and Prince Mohamed agree that the legal standards for the issuance of a Rule 54(b) certification to the U.S. Court of Appeals for the Second Circuit have been met.

For these reasons, the Kingdom, Prince Sultan, Prince Turki, and Prince Mohamed do not oppose the Plaintiffs' Motion for Entry of Final Judgment.

Dated: June 2, 2005 Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to this Court's Case Management Order No. 2, on June 2, 2005, I caused a true and correct copy of the foregoing Response Of Defendants Kingdom Of Saudi Arabia, HRH Prince Sultan bin Abdulaziz Al-Saud, HRH Prince Turki Al-Faisal Al-Saud, and HRH Prince Mohamed Al Faisal Al Saud To Plaintiffs' Motion For Entry Of Final Judgments, to be served on all counsel of record electronically via the Court's Electronic Case Filing system.

Dated: June 2, 2005

Jamie S. Kilberg, Esq.

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